



Canadian Food
Inspection Agency

Agence canadienne
d'inspection des aliments

QSM - 03

3rd Revision

Quality System Requirements for Service Provider Approved under the Canadian Wood Packaging Certification Program (CWPCP)

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Canada

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Contact and Review

This manual will be updated every two years. For further information or clarification, please contact the Canadian Food Inspection Agency (CFIA).

Endorsement

Approved by:

Joanne Rousson, Project Coordinator

Date

Greg Stubbings, Chief Plant Health Officer

Date

Amendment Record

Amendments to this QSM will be given a consecutive number and will be dated.

Please ensure that all amendments are inserted, obsolete pages removed, and the record below is completed.

Amendment No:	Amended by:	Date of submission for approval of Amendment	Summary of amendment and number of amended page(s):
1	Mireille Marcotte	May 13, 2008	Minor administrative changes (throughout)
2	Brad Dorion	Sept 8, 2009	Minor administrative changes related to glossary of terms and removal of references to the former program (throughout); Added Service Provider's responsibilities when a facility changing owner or management retains the facility registration (CA) number (sections 7.1 and 7.7.2); Clarified facility's suspension process (sections 7.3b(v), 7.4(1) and 7.4(4)); Deleting duplicate information in section 7.6
3	Shimina Maccum	February 18, 2011	Minor administrative changes (throughout)
4			

Distribution

National Industry Organizations
Candidate Service Providers
CHTWPCP Working Group
CWPCP Working Group
CFIA website

1.0 Introduction

The CFIA *Quality System Requirements for Service Providers approved under the CWPCP* is a supplementary document to the Service Contract for the CFIA Directive D-01-05, *Canadian Wood Packaging Certification Program (CWPCP)*. For the purpose of this document, a Service Provider is an organization, company or person who has entered into a Service Contract with CFIA for the CWPCP and is accountable to the CFIA for the activities outlined herein. The Service Contract is a contract signed between the CFIA and a Service Provider for the delivery of registration and evaluation audits and follow-up activities at facilities registered under the CWPCP (i.e. that have applied and have been approved by the CFIA to participate in the CWPCP).

This document identifies the functional requirements that must be met by a Service Provider authorized to provide inspection services for the CWPCP. The Service Provider's policies and procedures that address these requirements must be described in a Quality Management System Manual (herein referred to as the manual) that will be subject to approval by the CFIA and to review from time to time.

2.0 Scope

This document is intended for use by authorized Service Providers involved in the inspection of wood packaging heat treatment facilities and/or wood packaging manufacturers under the CWPCP, CFIA inspection staff and any other interested parties. Within this document, the term facility refers to either a wood packaging facility, a fumigation facility or an HT treatment facility. A treatment facility is an officially authorized facility where recognized phytosanitary wood treatments are performed (i.e., within the content of this directive examples include: KD-HT, HT, methyl bromide fumigation, Chemical Pressure Impregnation).

3.0 References

- ISPM No. 5, Glossary of Phytosanitary Terms, FAO (updated annually)
- ISO Guideline 8402, Quality Systems Terminology
- ISPM No. 15, Regulation of Wood Packaging Materials in International Trade, FAO,
- ISPM No. 7, Export Certification Systems, Publication, FAO,
- CFIA Directive D-01-05, The Canadian Wood Packaging Certification Program
- CFIA Service Contract signed by Service Provider under the provisions of the CWPCP

- CFIA QSM No.02, Quality System Guideline for Facility Registration under the Wood Product Certification Programs (CWPCP and CHTWPCP)
- PI-07, The Technical Heat Treatment Guidelines and Operating Conditions Manual, CFIA.

4.0 Definitions, Abbreviations and Acronyms

Definitions for terms used in the present document can be found in the Plant Health Glossary of Terms at www.inspection.gc.ca/english/plaveg/protect/dir/glosterme.shtml.

5.0 Application for Recognition as a Service Provider

An organization, company or person (referred to as the “applicant”) who wish to be recognized as Service Provider must agree to comply with the terms and conditions set out under the CFIA Service Contract developed under the *Canadian Wood Packaging Certification Program (CWPCP)* (Directive D-01-05).

5.1 Application

An application for recognition as Service Provider pursuant to the standards shall be made in accordance to the Request for Proposal issued by CFIA. The application shall include a clear statement as to the scope of the recognition requested and such documents, including operating procedures, personnel proficiency assessment process and internal audit reports, (as outlined in the Request for Proposal) that will enable CFIA to determine if the requirements of this standard have been met.

5.2 Evaluation

The CFIA shall review the application referred to in 5.1 against the requirements established by this standard and the Request for Proposal, shall prepare a record of evaluation indicating the extent of fulfilment of the requirements and shall notify the applicant. Where this “desk audit” indicates essential fulfilment of the requirements of the standards, an initial systems audit (an audit conducted by the CFIA on the Service Provider and a representative number of registered facilities to verify compliance to the terms and conditions of the recognition) will be recommended.

5.3 Recognition

Where the CFIA confirms that the requirements set out in the standards have been fulfilled the CFIA may recommend to the President of the CFIA that the Service Provider be formally recognized as competent to perform specific activities by entering into an agreement pursuant to subsection 14(1) of the *Canadian Food Inspection Agency Act* to accept specific recommendations from the Service Provider. The CFIA shall make public this decision and agreement.

6.0 General Requirements

6.1 Organizational Requirements

The Service Provider shall:

- a) be legally identifiable;
- b) be capable of conducting work on a national basis within Canada in both official languages;
- c) be responsible for its verification activities;
- d) have documented policies and decision-making procedures that distinguish between activities for which it has received formal recognition and any other activities in which the body is engaged.
- e) not offer consultancies or other services which may compromise the objectivity of its recognition process and decisions;
- f) be soundly supported financially; and
- g) be free from commercial or any other influence that might affect its integrity.
- h) Ensure sufficient and competent personnel to undertake the requirements of audit program.
- i) Maintain a manual approved by the CFIA governing all aspects of the inspection program.
- j) In cooperation with CFIA provide to registered facilities, inspection requirements, recommend improvements to the requirements or process as experience or external conditions indicate, and notify certified facilities of updates or changes to the regulations as directed by the CFIA

6.2 Responsibilities of the Service Provider

The Service Provider shall perform the following tasks:

- a) Receive applications from facilities wishing to be registered under the CWPCP, review the facility' manual and recommend participation to the CFIA.
- b) Monitor compliance with the registration requirements through a regular program of audits, at the frequency and in the format specified by the CFIA.
- c) Identify, report to the facility and monitor the resolution of minor non-conformances
- d) Identify, report to the facility and the CFIA any major non-conformances and inspect as directed to confirm their resolution
- e) Maintain a manual approved by CFIA covering all aspects of the auditing program including provisions set out in this guideline.
- f) Maintain records and report to the CFIA in the manner and frequency specified
- g) Respond to applications by providing appropriate documentation, guidelines and references
- h) Provide guidelines for the preparation of a facility manual

- i) Describe procedures to process and evaluate applications and manuals, including initial audits and checklists
- j) Attend joint audits of facilities with CFIA
- k) Maintain knowledge of CFIA policies and guidelines, as well as CFIA's export requirements pertaining to wood exports.
- l) Inform the registered facility of any changes within this program.
- m) Describe procedure for signing up new facility to Inspection Services Agreement
- n) Describe procedure for conducting inspections (provide examples of checklists and reports) and reporting results (this may all be described in a separate inspection manual)

6.3 Organizational Structure and Position Responsibilities

Provide an organization chart identifying all positions having responsibility for activities included in the provision of service.

Define the responsibilities of each position.

Identify and describe the responsibilities of a key individual to act as contact with the CFIA and manager of the program.

6.4 Qualifications and Training of Personnel

Identify personnel involved in inspection program

Identify qualifications of all such personnel

Describe training program for such personnel

Describe procedure used to monitor performance

Describe records kept of training and performance

7.0 Specific Requirements

7.1 Registration of Facilities

- (a) Upon execution of a Service Contract, the Service Provider will make its services as a Service Provider under the CWPCP available to facilities wishing to register under such program.
- (b) The Service Provider will conduct the reviews, inspections, audits and other duties set out under the CWPCP program and detailed in the manual.
- (c) Upon receipt of the required application form, the manual, and Information Collection Acknowledgment Form (Appendix 1 of this Agreement) from a facility applying for registration, and upon receiving from the facility a signed agreement for Service Provider services, in a form satisfactory to the Service Provider, the Service Provider shall:
 - (1) forward to the CFIA a copy of the facility's complete application;
 - (2) review and report on the facility's manual against the conditions specified in the D-01-05 (CWPCP) section 4.3 (quality requirements);

- (3) prepare a report of its assessment for the CFIA, including its recommendation as to acceptance or rejection of the application, and the reasons therefore; and
 - (4) recommend for registration to the CFIA.
- (d) For facilities accepted in principle for registration by the CFIA, the CFIA and the Service Provider will coordinate and conduct a joint initial evaluation audit of the facility to verify that it can meet the requirements specified in the CWPCP. An evaluation audit is an audit performed at the time of registration to verify that a facility is capable of meeting the standards prescribed. The audit also verifies that the facility manual is being adhered to and that facility employees are sufficiently trained.

Note: When a new application is sent because the facility is changing ownership and the new owner wishes to retain the facility's CA number, it is the responsibility of the Service Provider to first consult with the CFIA and to inform the facility of all the implications and responsibilities associated with retaining this registration number.

7.2 Maintenance of Facility Registration

7.2.1 Audits

Audits are to be conducted in accordance with the Service Agreement and as outlined in this section.

Audits by Service Provider

- (a) The Service Provider will attend at each registered facility contracting with it as a Service Provider and audit the facility's operations in the context of the facility's manual, and as against the applicable requirements of the CWPCP.
- (b) The Service Provider will conduct all audits in a manner that is consistent with the requirements set out in this document, and set out in "*The Quality System Requirements the Canadian Wood Packaging Certification Program (CWPCP) or the Canadian Heat Treated Wood Products Certification Program (CHTWPCP)*" or QSM-02, and without any prejudice or conflict of interest.
- (c) Subject to reporting to the CFIA as required under the Service Contract and the CWPCP, the Service Provider will ensure that all records of inspections, audits, enforcement actions taken and any other information pertaining to facilities are kept confidential and secure at all times.

Audits conducted by CFIA

The CFIA will conduct an audit on the Service Provider and a representative sample of the registered facilities to verify compliance to the terms and conditions of this recognition.

7.2.2 Activities and Frequency of Audits

	Facility with a Heat Treatment Chamber (Primary Treatment Facility)	Exporters, Shippers, Brokers Consolidating Treated Materials, Secondary Manufacturers Using Heat Treated Products (Including Wood Packaging Facilities)
Application for registration under the CWPCP & Submission of the manual	Prior to registration.	Prior to registration.
Issuance of facility registration number by CFIA	Upon approval of facility's manual	Upon approval of facility's manual
Evaluation Audit conducted by Service Provider in cooperation with the CFIA	To be conducted prior to registration, or as a result of suspension from the program to confirm that a facility has adequately addressed the non-conformities and initiated quality activities that would ensure that future non-conformities may be avoided. Often when evaluation audits are performed following suspension significant revision of the manual has been completed.	To be conducted prior to registration, or as a result of suspension from the program to confirm that a facility has adequately addressed the non-conformities and initiated quality activities that would ensure that future non-conformities may be avoided. Often when evaluation audits are performed following suspension significant revision of the manual has been completed.

Verification Audit conducted by the Service Provider (i.e., a review of the organizational structure, procedures, processes and resources used by a registered facility in implementing the certification program)	A minimum of 4 times a year	A minimum of 4 times a year in the first year of registration or re-registration following suspension and 2 times a year in subsequent years
Follow-up audit (i.e., an audit performed to verify that corrective actions ordered have been completed and that facility operations continue to meet the specifications of the facility manual).	At any time until non-conformances are corrected to the satisfaction of the Service Provider and/or CFIA	At any time until non-conformances are corrected to the satisfaction of the Service Provider and/or CFIA
Systems Audits conducted by CFIA	An annual audit conducted on the Service Provider and a representative sample (up to 33%) of registered facilities on an annual basis	An annual audit conducted on the Service Provider and a representative sample (up to 33%) of registered facilities on an annual basis

7.3 Reporting and Resolution of Facility Non-conformances

The Service Provider will provide a report to the facility of its audit and will identify elements that require improvement, non-conformances, and corrective actions which are required in the event that non-conformance has been identified.

In the event that corrective actions are required to address non-conformances which has been identified during the audit, the Service Provider will take the following additional actions:

- (a) for a minor non-conformance, as outlined under the **Quality System Guidelines for Facility Registration under the Wood Product Certification Programs** Canadian Heat Treated Wood Products Certification Program (CHTWPCP) and Canadian Wood Packaging Certification Program (CWPCP) (QSM):
- (i) the Service Provider shall provide a report to the facility of its audit within 5 working days after having conducted the audit.
 - (ii) the Service Provider shall verify that the corrective actions requested has been completed by the facility within a reasonable time frame, not exceeding one (1) month from the date of initial notification of the non-conformance by the Service Provider;
 - (iii) the Service Provider shall provide the CFIA in its quarterly report information regarding the non-conformance, the planned corrective action and follow-up confirmation that the corrective action has been completed.
- (b) for a major non-conformance, as defined under the **Quality System Guidelines for Facility Registration under the Wood Product Certification Programs** Canadian Heat Treated Wood Products Certification Program (CHTWPCP) and Canadian Wood Packaging Certification Program (CWPCP) (QSM):
- (i) the Service Provider shall deliver to the registered facility, and to the CFIA a notice in writing with a description of the non-conformance and the required corrective action within 3 working days of such non-conformance;
 - (ii) the Service Provider shall request the facility to take corrective action within a time frame appropriate to address the non-conformance but not to exceed 10 working days;
 - (iii) the Service Provider shall follow-up on corrective actions taken by the facility as often as required to verify full compliance within 10 working days of initial notification of the corrective action due date.
 - (iv) the Service Provider shall provide written confirmation to the CFIA, that the required corrective action, or other actions, has not been taken within 3 working days.
 - (v) Where the major non-conformance compromises the integrity of the program, the Service Provider will recommend, to the CFIA, the suspension of the facility from the program and will remove, in collaboration with the CFIA, all stamps and certificates relevant to this program. The recommendation to suspend a facility will occur within 3 working days following the audit of the facility by the Service Provider.

7.4 CFIA's Activities and Follow-up Actions

- (1) Where the CFIA has been notified of a major non-conformance as set out herein, the CFIA may apply an interim suspension of the facility's registration under the CWPCP, and will provide notice in writing thereof to the facility and the Service Provider immediately upon the decision to suspend by the CFIA. During the suspension period, the registered facility will not be permitted to certify wood packaging products for export as outlined in the CWPCP.

- (2) Should the CFIA determine in its sole and unfettered discretion that the proposed corrective action or implemented corrective action by the Service Provider is unsatisfactory, the Parties agree that the CFIA reserves the right to directly impose or implement upon the registered facility whatever corrective action it deems necessary to correct the non-conformance.
- (3) In the event of a non-conformance by a registered facility, the CFIA may increase the frequency of inspection of the facility, until corrective actions satisfactory to the CFIA are verified by the Service Provider as being complete.
- (4) Where the CFIA determines, in its sole and unfettered discretion, that a registered facility is consistently unable to maintain conformance with the CWPCP or that a registered facility's non-conformance jeopardizes the integrity of the CWPCP, the CFIA may suspend or revoke the registered facility's registration under the CWPCP, following consultation with the Service Provider. In such event, the CFIA program officer will notify the Service Provider and the registered facility in writing of this action.
- (5) If the facility's corrective actions and quality are deemed sufficient by the CFIA, the CFIA will lift the suspension will assign the facility a new inspection frequency. Once the facility has demonstrated to the Service Provider on-going compliance with the requirements of the CWPCP, the Service Provider will reduce the frequency of inspection to that specified the *Quality System Procedures for The Export Certification Programs, CHTWPCP (D-03-02) and the CWPCP (D-01-05)*.

7.5 Audit Reports

The Service Provider must describe procedures for conducting inspections (provide examples of checklists and reports) and reporting results (this may all be described in a separate inspection manual). The Service Provider must describe procedures for reporting non-conformity and , if major, notifying the CFIA and must describe procedures for following up major non-conformity and reporting to the CFIA.

In the evaluation and surveillance audit the following information must be included:

Type of audit: Evaluation, or Verification audit

Date of Audit:

Date of Previous Audit:

Audit Report No.:

Facility Name:

Address:

Location:

Lead Auditor:

Team Members:

Summary of Audit

List of minor non-conformances

Corrective Action Requests

List of major non-conformances

Corrective Action Requests

Facility Compliance status: Compliant Suspended

Signature of lead Auditor:

Date:

Signature of Facility Representative:

Date:

Distribution list:

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7.6 General Reports to the CFIA

- (a) The Service Provider will provide to the CFIA annually, on or before March 31 of each year, a detailed report in writing of all audits, inspections and follow-up activities completed during that fiscal year. The report will include, but will not be limited to, a listing of facilities by Service Providers, information on the total number of audits performed by each Service Provider, a list of the facilities audited, a list of major non-conformances found, number of facilities added or deleted from the program and relevant dates.
- (b) The Service Provider will advise the CFIA in writing as soon as it comes to the attention of the Service Provider that a registered facility ceases to operate under agreement with the Service Provider or has withdrawn from the CWPCP.
- (c) The Service Provider will maintain for a period of at least two (2) years all records pertaining to its verification of facilities, including but not limited to: assessment reports for registration, audit reports, reports of non-conformances and follow-up audits, authorizations of changes to manuals and to the training of Service Provider staff.
- (d) The Service Provider will complete and date a report of each audit conducted on the registered facilities they have audited in the process, and such reports will be kept on file by the Service Provider for periodic review by the CFIA.
- (e) The Service Provider will meet any other reporting requirements as mutually agreed upon from time to time.

7.7 Suspension or Cancellation and Re-application of Facility Registration

7.7.1 Suspension

A Registered Facility will be suspended, in full or in part, for a specified period if:

- a) an audit identifies a system failure that casts doubt on the ability of the facility to adequately discharge its duties;
- b) agreed corrective actions are not implemented within the prescribed time period;
- c) applicable fees are not paid.

7.7.2 Cancellation

A Registered Facility will be cancelled, in full or in part, if:

- a) requested by the facility; or
- b) an audit identifies systematic, ongoing failure of the facility to adequately discharge its duties.

If a registered facility is permanently removed from the program, resold or operating under new managements and also operating under a new Certificate of Registration and Registration Number or voluntarily withdraws from the CWPCP, their facility number shall be cancelled from use and removed from the CFIA list of registered wood packaging facilities or the CFIA list of registered wood packaging treatment facilities. The facility registration number must not be re-used.

Note: If a registered facility is resold or operating under new management but not operating under a new Certificate of Registration and Registration Number (the new owner or manager wishes to retain the facility's CA number), it is the responsibility of the Service Provider to inform the facility of all the implications and responsibilities associated with retaining this registration number.

The CFIA Auditor or Service provider forwards an e-mail to the Area Program Specialist and the Forestry Officer advising that the facility has been cancelled from the CWPCP. The CFIA will send a letter to the facility providing official notification that the facility has been cancelled from the program.

The CFIA will arrange for the cancelled facility registration number to be removed from the CFIA Forestry Website.

7.7.3 Reinstating of Facility Registration

Wood packaging facilities or treatment facility that have been cancelled from the CWPCP must completely re-register starting with submission of the CWPCP application form.

8.0 Suspension and Cancellation of the Service Provider

8.1 General information

- (a) Where the CFIA determines in its sole and unfettered discretion that the Service Provider has not complied with the requirements of the CWPCP or is in default of any representation, covenant, term or condition of the articles of Agreement, the CFIA will provide the Service Provider with a report detailing such non-compliance and/or default.
- (b) Upon receipt of such report, the Service Provider will immediately begin remedying such non-compliance and/or default and will demonstrate to the CFIA within one (1) month that such non-compliance and/or default has been remedied to the satisfaction of the CFIA, failing which, the CFIA will be entitled to suspend or revoke, at its sole discretion, recognition of the Service Provider as a Service Provider under the CWPCP and to communicate the same to the registered facilities contracting with the Service Provider.
- (c) The CFIA may, in its sole and unfettered discretion, increase the frequency of inspections of the Service Provider where non-compliance or defaults exist as described in this section.

- (d) Facilities recommended for registration to the CFIA by a Service Provider and registered by CFIA and which has been subsequently cancelled from the program, will be required to seek the service of another CFIA recognized Service Provider.

8.2 Suspensions

The Service Provider will be suspended, in full or in part, for a specified period if:

- a) an audit identifies a system failure that casts doubt on the ability of the Service Provider to adequately discharge its duties;
- b) agreed corrective actions are not implemented within the prescribed time period;
- c) assessment protocols are altered such that they no longer meet the minimum standards used by the CFIA;

8.3 Cancellations

The Service Provider will be cancelled, in full or in part, if:

- a) requested by the Service Provider; or
- b) an audit identifies systematic ongoing failure to adequately discharge its duties.

9.0 CFIA fees

Fees payable by facilities for participation under this program, will be made directly to the CFIA. The CFIA will be charging fees in accordance with the *Canadian Food Inspection Agency Fees Notice*. Individuals requiring more information on fee schedules may contact any CFIA regional office or visit our web site at: <http://www.inspection.gc.ca/english/directory/offbure.shtml>

Note: At time of publication of this document, the annual CFIA registration fee for facilities participating under this program is \$400.00. The CFIA reserves the right to charge an additional fee for its service, in accordance with the *Canadian Food Inspection Agency Fees Notice*, for follow-up inspection activities performed to verify that the requested corrective actions have been taken by the facilities, to address the major non-conformances.

Appendix 1**Information Collection Acknowledgment Form**

TO: _____
 (full legal name of the Service Provider)

Canadian Food Inspection Agency

I _____ (name of owner or person with possession, care, or control of the facility), hereby acknowledge that I have read and understand the following terms and conditions as they apply to the collection of information related to the facility located at _____ (address).

The Canadian Wood Packaging Certification Program

1. I have been informed and understand that:

- a) The Canadian Food Inspection Agency (CFIA) has recognized _____ (full legal name of the Service Provider) as a Service Provider under the Canadian Wood Packaging Certification Program (CWPCP) established in Directive D-01-05.
- b) The _____ (full legal name of the Service Provider) is responsible for collecting, reviewing and reporting to the CFIA on the facility's Application for Registration to the Canadian Wood Packaging Certification Program (CWPCP) and manual.
- c) The CFIA is responsible for the registration, suspension or cancellation of registration of any facility registered in the CWPCP.

Legal Ownership/Possession/Care or Control

2. (1) I hereby confirm that I am the owner, or person with legal possession, care, or control of the facility in question and that I have the full and complete right to grant permission to _____ (full legal name of the Service Provider) to disclose to the CFIA the following information and documents:
 - (a) name of the facility;
 - (b) address of the facility;
 - (c) telephone number of the facility;
 - (d) the facility's Application for Registration to the Canadian Wood Packaging Certification Program (CWPCP); and
 - (e) the facility's manual.

and furthermore I grant permission to _____ (*full legal name of the Service Provider*) to disclose said information and materials.

- (2) I further confirm that I have the right and authority to grant and provide such permission to disclose the information and documents as described in subparagraph 2(1) without the consent of any third Party and without violating the rights of any third Party.

I hereby confirm the truth of the above statements and that I have read and understand accept and agree with the above statements and terms.

Signed this _____ day of _____, 201_

at _____
(*address*)

Owner/Person with Possession, Care, or Control of the Establishment